# IN THE UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF TEXAS HOUSTON DIVISION

RAMIRO FELIX GONZALES,	§	
Plaintiff,	§	
•	§	
V.	§	
	§	
BRYAN COLLIER, Executive	\$ §	Civil Case No. 4:21-cv-828
Director,	§	
Texas Department of Criminal	§	
Justice, Huntsville, Texas;	\$ §	
oustice, fruittsville, fexas,		
BOBBY LUMPKIN, Director,	§ §	
Texas Department of Criminal	\$ §	
1		EXECUTION
Justice, Correctional Institutions	§	
Division, Huntsville, Texas;	§	SCHEDULED
_	§	FOR~JULY~13,~2022
and	§	
	§	
DENNIS CROWLEY, Warden,	§	
Texas Department of Criminal	§	
Justice, Huntsville Unit,	§	
Huntsville, Texas,	§	
Defendants.	3	
Dejenaanio.		

## PLAINTIFF'S UNOPPOSED MOTION TO SEAL MOTION FOR PRELIMINARY INJUNCTION

Plaintiff Ramiro Felix Gonzales respectfully requests to file his Motion for Preliminary Injunction under seal. Discovery in Mr. Gonzales's case is subject to a protective order, Dkt 25, and confidential facts are used and referenced in this filing. Mr. Gonzales's response also heavily cites and

references various sealed filings in this case. Mr. Gonzales seeks to avail himself of those facts while abiding by the terms of the joint protective order.

Allowing Mr. Gonzales to file this document under seal will not prejudice or hinder Defendants in litigating this case. Mr. Gonzales will provide Defendants' counsel with a copy of this filing.

Dated this 24th day of June, 2022.

Respectfully submitted,

JASON D. HAWKINS Federal Public Defender

<u>/s/ Jeremy Schepers</u> Jeremy Schepers (TX 24084578) Supervisor, Capital Habeas Unit

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#### CERTIFICATE OF WORD COUNT

Counsel certifies	that the	body of	this	Motion	contains	102	words,	accordin	ng to
his word-processi	ng progra	am.							

<u>/s/ Jeremy Schepers</u> Jeremy Schepers

### CERTIFICATE OF CONFERENCE

Counsel certifies that he conferred with opposing counsel, Leah O'Leary, who informed the undersigned that Defendants are unopposed to the relief requested in this Motion.

<u>/s/ Jeremy Schepers</u> Jeremy Schepers

#### CERTIFICATE OF SERVICE

I hereby certify that on June 24, 2022, I sent a true and correct copy of the foregoing was filed in this Courts CM/ECF system, which will serve Leah O'Leary, counsel for the Defendants, at leah.oleary@oag.texas.gov.

<u>/s/ Jeremy Schepers</u> Jeremy Schepers